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September 18, 2025

VIA ECF

Honorable Georgette Castner
United States District Judge
District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Honorable Tonianne J. Bongiovanni
United States Magistrate Judge
District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: *Kumar et al. v. Bochasanwasi Shri Akshar Purushottam Swaminarayan Sanstha, Inc.*, 3:21-cv-11048-GC-TJB

Dear Judges Castner and Bongiovanni:

We represent Defendants Bochasanwasi Shri Akshar Purushottam Swaminarayan Sanstha, Inc., BAPS Atlanta, LLC, BAPS Chicago, LLC, BAPS Chino Hills, LLC, BAPS Houston, LLC, BAPS Mercer, LLC, BAPS Robbinsville, LLC, BAPS Development, Inc., BAPS Fellowship Services, Inc., Bharat Patel, a/k/a Bharat Doe a/k/a Bharat Bhai, Kanu Patel, Pankaj Patel, Swami Prasanand a/k/a Prashant Darshan Das Sadhu, and Rakesh Patel in the above-referenced civil action.¹

On May 11, 2021, the U.S. Department of Justice (“DOJ”) and various federal investigative agencies conducted a highly publicized “raid” at the BAPS mandir in Robbinsville, New Jersey. On the same date, the plaintiffs commenced this action with a complaint alleging violations of the Trafficking Victims Protection Act (“TVPA”), the

¹ We do not represent Defendants BAPS Bochasanwasi Shri Akshar Purushottam Swaminarayan Sanstha (an India Public Trust) or Harshad Chavda.

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Fair Labor Standards Act (“FLSA”), and related causes of action. On October 23, 2021, plaintiffs filed an amended complaint adding plaintiffs, allegations, and causes of action.

Because DOJ’s investigation also involved potential violations of the TVPA, that statute required that the Court stay this action until the completion of the investigation. *See* 18 U.S.C. § 1595(b)(1). By agreement of the parties, the Court entered a stay Order on November 23, 2021. ECF No. 22. Since then, the Order has remained in effect as the parties have filed periodic status reports advising that the DOJ’s investigation was ongoing.

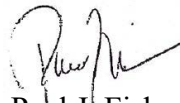
On September 12, 2025, having been informed by an attorney for the government that the status of the investigation was unchanged, plaintiffs filed a motion to lift the stay in this action, or in the alternative, to sever the TVPA allegations to allow the remaining causes of action to proceed. *See* ECF No. 80.

Since that time, however, the attorneys for the government have provided counsel for BAPS with further updates on the status of the investigation. Specifically, in conversations with counsel for BAPS on September 15 and 16, 2025, they have advised that DOJ has closed its investigation of BAPS and the other entities and individuals named as defendants in this lawsuit.

Accordingly, we write to advise the Court that there is no longer a basis on which to continue the stay, and it appears that the plaintiffs’ motion is now moot.

We will arrange for a conference with plaintiffs’ counsel to discuss a proposed form of Order and an appropriate schedule for a response to the Amended Complaint.

Respectfully submitted,



Paul J. Fishman

CC: Counsel of Record

No later than October 1, 2025, the parties are directed to confer and submit a proposed form of Order lifting the stay, reopening the matter, and proposing a schedule for Defendants’ response to the Amended Complaint.

It is on this 19th day of September, 2025,
SO ORDERED.

s/Tonianne J. Bongiovanni US 255010583v8
Hon. Tonianne J. Bongiovanni, U.S.M.J.